UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Case No. 1:23-cv-16245
udge Virginia M. Kendall

MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION

Plaintiff files this unopposed Motion for entry of an Order extending Plaintiff's time to respond to Defendant's Motion to Dismiss through and including March 22, 2024. In support of its Motion, Plaintiff states as follows:

- 1. Defendants filed their Motion to Dismiss on 2/9/24.
- 2. Plaintiff's opposition is due on 3/19/24.
- 3. Plaintiff's counsel is unable to file an opposition due to an acute medical issue.
- 4. Plaintiff's counsel contacted Defendant's counsel regarding this matter, but did not receive a response prior to filing.
- 5. The short extension requested by Plaintiff is for good cause and will not unduly delay this litigation.

¹ Please take notice that Defendant's full legal name is Central States Southeast and Southwest Areas Health and Welfare and Pension Funds.

WHEREFORE, Plaintiff, for good cause shown, respectfully requests that the Court

enter an Order extending her time to respond to the Motion to Dismiss through and including

March 22, 2024 and to further extend Defendant's time to reply through and including April 16,

2024.

DATED: March 19, 2024

Respectfully Submitted,

HR Law Counsel LLC

By: /s/ Ethan G. Zelizer

Attorney for Plaintiff

Ethan Zelizer

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CERTIFICATE OF SERVICE

I certify that on March 19, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/: Ethan G. Zelizer Ethan G. Zelizer

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